1	EDWARD T. SAADI, Esq.	
2	Ohio Bar No. 0075775	
2	EDWARD T. SAADI, LLC	
3	970 Windham Ct., Ste. 7 Boardman, OH 44512	
4	Telephone: 330.782.1954	
5	Facsimile: 330.266.7489	
	edwardsaadi@aol.com (Attorney has complied with LR IA 11-2)	
6	(Attorney has complied with LK 1A 11-2)	
7	JEFFREY A. COGAN, Esq.	
8	Nevada Bar No. 004569 JEFFREY A. COGAN, ESQ., LTD.	
9	6900 Westcliff Drive, Suite 502	
	Las Vegas, NV 89145	
10	Telephone: 702.474.4220	
11	Facsimile: 702.474.4228 jeffrey@jeffreycogan.com	
12	Attorneys for Plaintiff Aladdin's Eatery Systems, Inc.	
13		
	IN THE UNITED STATES DISTRICT COURT	
14	DISTRICT OF NEVADA	
15		
16	ALADDIN'S EATERY SYSTEMS, INC., an ) Ohio corporation,	CASE NO: 2:18-CV-00412 APG-GWF
17	Disinsiff	Judge Andrew P. Gordon
18	Plaintiff,	Magistrate George Foley, Jr.
19	v. )	MOTION AND ORDER TO
		EXTEND DEADLINE FOR PLAINTIFF
20	PHWLV, LLC, a Nevada limited liability company; and OPBIZ, LLC, a Nevada limited )	TO RESPOND TO MOTION TO DISMISS PLAINTIFF'S COMPLAINT PURSUANT
21	liability company,	TO FED. R. CIV. P. 12(b)(1) AND 12(b)(6)
22	Defendants.	(First Request)
23		(2 2 2 3 4 2 3 5 4 2 3 5 7 5 7 5 7 5 7 5 7 5 7 5 7 5 7 5 7 5
24	Plaintiff, Aladdin's Eatery Systems, Inc. ("AES"), by and through counsel, hereby	
25	requests a 14-day extension of time to respond to Defendant PHWLV, LLC's <b>Motion to Dismis</b> s	
	DI: 4'60' C	
26	Plaintiff's Complaint Pursuant to Fed. R. Civ. R. 12(b)(1) and 12(b)(6) [Document #21],	
27	which was filed on <u>June 8, 2018</u> . This Motion is made and based upon Local Rule LR IA 6-1,	
28	the attached Memorandum, and the pleadings and papers on file.	

## 1 **MEMORANDUM OF POINTS AND AUTHORITIES** 2 Plaintiff AES respectfully requests this Court grant its Motion and [Proposed] Order to 3 Extend Deadline for Plaintiff to Respond to Motion to Dismiss Plaintiff's Complaint 4 Pursuant to Fed. R. Civ. P.12(b)(1) and 12(b)(6). This is the Plaintiff's first motion to extend 5 time. Plaintiff submits this Motion in good faith and not for purposes of delay. 6 7 Defendant PHWLV, LLC has agreed to this request for a 14-day extension. 8 PHWLV, LLC's Motion presents complex issues regarding jurisdiction and construction 9 of the Declaratory Judgment Act, 28 U.S.C. §§2201 et seq. AES requires additional time to fully 10 research the issues, consult with counsel on the underlying facts, and prepare a proper response. 11 WHEREFORE, Plaintiff respectfully requests that its deadline to respond to PHWLV, 12 13 LLC's Motion to Dismiss Plaintiff's Complaint Pursuant to Fed. R. Civ. R. 12(b)(1) and 14 **12(b)(6)** be extended to July 6, 2018. 15 DATED this 19<sup>th</sup> day of June, 2018. EDWARD T. SAADI, LLC 16 By: /s/ Edward T. Saadi\_ 17 Edward T. Saadi, Esq. 18 Ohio Bar No. 0075775 970 Windham Ct., Ste. 7 19 Boardman, OH 44512 Telephone: 330.782.1954 20 Facsimile: 330.266.7489 21 edwardsaadi@aol.com (Attorney has complied with LR IA 11-2) 22 IT IS SO ORDERED. JEFFREY A. COGAN, Esq. 23 Nevada Bar No. 004569 24 JEFFREY A. COGAN, ESQ., LTD. 6900 Westcliff Drive, Suite 502 United States District Judge 25 Las Vegas, NV 89145 Dated: June 19, 2018 Telephone: 702.474.4220 26 Facsimile: 702.474.4228 27 jeffrey@jeffreycogan.com Attorneys for Plaintiff 28 Aladdin's Eatery Systems, Inc.